

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. EILEEN E. HINES,

Plaintiff,

v.

2. INTEGRIS BAPTIST MEDICAL
CENTER,

Defendant.

Case No: CIV-15-658-W

(Formerly Case No: CJ-2015-
2664, Oklahoma County District
Court)

NOTICE OF REMOVAL

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, Defendant, INTEGRIS Baptist Medical Center (“INTEGRIS”), hereby removes this action from the District Court of Oklahoma County, Oklahoma, where it was filed as Cause No. CJ-2015-2664, styled *Eileen E. Hines v. Integris Baptist Medical Center* (the “State Court Lawsuit”), to the United States District Court for the Western District of Oklahoma. As the grounds for removal, INTEGRIS states as follows:

1. The Petition in this matter was filed on May 8, 2015 in the State Court of Oklahoma County, Oklahoma, which is located within the Western District of Oklahoma. INTEGRIS was served with the Petition and Summons on May 27, 2015, attached as Exhibit 1. This Notice of Removal is, therefore, timely filed under the provisions of 28 U.S.C. §1446.

2. Plaintiff is a former Health Unit Coordinator that was employed by INTEGRIS Baptist Medical Center and is a current resident of Oklahoma County, Oklahoma.

3. At the time of this action, and at the present time Defendant, INTEGRIS, was and is a corporation doing business within the state of Oklahoma.

4. Plaintiff has alleged federal claims under the Americans with Disabilities Act, as amended, the Age Discrimination in Employment Act, the Family Medical Leave Act, and Title VII of the Civil Rights Act of 1964, as amended.

5. Because this civil action arises under the Constitution, laws or treaties of the United States, this court has original jurisdiction and as such, is removable to the District Court of the United States without regard to the citizenship or residence of the parties pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441(b). This Court has jurisdiction over plaintiffs' state law claims pursuant to 28 U.S.C. § 1441(c) and 28 U.S.C. § 1367.

6. A copy of the State Court docket sheet is attached hereto as Exhibit 2, and copies of all other documents filed in the case are attached as Exhibit 3.

7. Pursuant to 28 U.S.C. § 1446(d), INTEGRIS certifies that it will promptly serve written notice of the filing of this Notice Removal upon counsel of record for Plaintiff and will likewise file a copy of this Notice of Removal with the court clerk for the District Court of Oklahoma County, Oklahoma.

Respectfully submitted,

s/Courtney Warmington

Leonard Court, OBA #1948

Courtney K. Warmington, OBA #18486

CROWE & DUNLEVY

A Professional Corporation

Braniff Building

324 North Robinson Avenue, Suite 100

Oklahoma City, OK 73102

(405) 235-7700

(405) 239-6651 (Facsimile)

leonard.court@crowedunlevy.com

courtney.warmington@crowedunlevy.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day June, 2015, I electronically transmitted the foregoing document to the Court Clerk using the EFC System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the following EFC registrants:

E. Ed Bonzie

8201 S. Walker

Oklahoma City, OK 73139

Telephone: (405) 631-1021

Facsimile: (405) 616-2488

ed@edbonzielaw.com

Attorney for Plaintiff

s/Courtney Warmington

Courtney Warmington